

CRIMINAL CAUSE FOR STATUS CONFERENCE

Before: Dora L. Irizarry, U.S.D.J. Date: Feb. 21, 2018 Time in Court: 1:18

Docket Number: 16-CR-614 (DLI)

Deft Name: DAN ZHONG #1
X Present Not Present X Custody Bail

Defense Counsel: ROBERT CLEARY, DIETRICH SNELL, BRITTANY BENAVIDEZ
 CJA X Retained Federal Defenders

A.U.S.A.: IAN RICHARDSON AND NICHOLAS MOSCOW (prosecution team) AND
ELIZABETH MACCHIAVERNA (filter team)

Court Reporter: HOLLY DRISCOLL

Interpreter: JOHN LAU (Mandarin)

Deputy Clerk: Christy Carosella

X Status Conference held.

X **Speedy Trial:** Code Type XE Start 2/21/2018 Stop 6/20/2018
 Order / Waiver Executed & Filed. X Entered on record.
X In the interest of justice as stated on the record and with consent of parties.

 Further status conference set for June 20, 2018 at 10:00 AM in courtroom 4 A South. Parties will be notified if hearing/oral argument will be needed on motions. If so, the Court will enter an scheduling order noting specific issues for focus. **Trial date will be set at the June 20 conference.**

Other: Government has made seven discovery disclosures since last conference; R16 discovery is largely complete. Last set of material to be disclosed 120 days in advance of trial per protective order. Plea offer made to defendant yesterday (expires March 23, 2018). Government recommends setting motion and trial schedules. Defense raises three discovery issues: (1) Diplomatic notes; (2) Franks motion; (3) Identification of victims to be proved by Government at trial. Review of e-mails by taint team will be done over the next four weeks and provided to defense on a rolling basis. Schedule set for defendant's Franks motion: Motion due by March 9, 2018; opposition due by March 30, 2018; Reply due by April 13, 2018. Schedule set for Government's motion *in limine* (this schedule will also apply to any motion *in limine* by the defendant; if none, counsel shall notify the Court by letter): Motion(s) due by April 27, 2018; opposition(s) due by May 11, 2018; reply due by May 18, 2018. TWO HARD COUTESY COPIES OF ALL MOTION PAPERS MUST BE PROVIDED TO CHAMBERS PROMPTLY. The Government's request for a separate briefing schedule for *Giglio* motion is denied. Defense notes two other motions, one definite and one potential: (1) *Definite* relates to disclosure of documents subject to the protective order; motion to be filed by defense by March 2, 2018. Government will take a position on this after review of defendant's motion; (2) *Potential* Motion to Compel. Defense raises issue with respect to bill of particulars; arguments heard. Government anticipates its case on trial to take approximately 2-3 weeks; defense case to take approximately one week. No request for anonymous jury. Trial will likely be scheduled this autumn.